

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

HB Productions, Inc.,	)	<b>Case No.: 1:19-cv-00487-JMS-KJM</b>
	)	(Copyright)
Plaintiff,	)	
vs.	)	<b>DECLARATION OF COUNSEL</b>
	)	
Muhammad Faizan, et al.	)	
	)	
Defendants.	)	
	)	
	)	
	)	

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**DECLARATION OF COUNSEL**

KERRY S. CULPEPPER hereby declares under penalty of laws of the United States that the following is true and correct.

1. I am an attorney and represent the Plaintiff, I have personal knowledge of the matters stated herein, and this declaration is given in support of Plaintiff's First *Ex Parte* Motion for an Order Permitting Foreign Mailing by Fed Ex pursuant to the provisions of FRCP 4(f)(2)(C)(ii) to Defendant Muhammad Faizan ("Faizan").

2. I certify that this method of service is authorized by the domestic law of Pakistan, and that I obtained this information by checking the website "Pakistan - Central Authority & practical information" of The World Organisation for Cross-border Co-operation in Civil and Commercial Matters on September 11, 2019 at <https://www.hcch.net/en/states/authorities/details3/?aid=288> and researching the

Civil Procedure of Pakistan.

3. I consulted with Mr. Muhammad Ijaz Rahim, an attorney licensed to practice law in Pakistan, regarding the question of whether service of process by mail is prohibited by the laws of Pakistan in a different case. Mr. Rahim is the managing partner in the law firm AL-RAHIM TRADEMARK & PATENT ATTORNEYS.

4. Mr. Rahim informed me, via email on April 23, 2019, that Pakistan "...has no objection to such service by postal channels directly to the persons concerned (Article 10(a))".

5. I have exchanged emails with Defendant Faizan at [mkvcage@gmail.com](mailto:mkvcage@gmail.com) on Friday September 6, 2019 and Monday September 9, 2019 regarding the allegations of Copyright Infringement by Plaintiff. On September 9, 2019, I asked him multiple times if he would be willing to sign a waiver of service. He never directly replied to my question.

I declare under the penalty of perjury that the foregoing is true and correct.

DATED: Kailua-Kona, Hawaii, September 12, 2019.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper  
Kerry S. Culpepper

Attorney for Plaintiff